

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CHRISTOPHER MORALES and MARY  
HELEN MORALES,  
*Plaintiffs,*

v.

CIVIL ACTION NO. 5:22-cv-00527-XR

SPECIALIZED LOAN SERVICING, LLC,  
*Defendant.*

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**SPECIALIZED LOAN SERVICING LLC'S EXPERT DISCLOSURES**

TO: Plaintiffs, Christopher Morales and Mary Helen Morales, by and through their attorney of record, William M. Clanton, LAW OFFICE OF BILL CLANTON, P.C., 926 Chulie Dr., San Antonio, Texas 78216.

COMES NOW SPECIALIZED LOAN SERVICING, LLC ("SLS" or "Defendant") and pursuant to FED. R. CIV. P. 26(a)(2), makes the following disclosures:

1. The identity of any witness Defendant may use at trial to present evidence under FED. R. EVID. 702, 703 or 705;

Branch M. Sheppard  
Annarose M. Harding  
Galloway, Johnson, Tompkins, Burr & Smith, A PLC  
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(713) 599-0700

Re: Mr. Sheppard and/or Ms. Harding may provide testimony regarding the reasonableness and necessity of attorney's fees claimed by any party in this case, based on their experience as attorneys licensed to practice and practicing in Texas and consideration of the factors articulated in the Texas Disciplinary Rules of Professional Conduct and relevant case law. A reasonable attorneys' fee has not yet been fully calculated as this case is still on-going, and this response will be further supplemented as necessary to comply with the Federal Rules of Civil Procedure.

Defendant reserves the right to elicit, by way of cross-examination, opinion testimony from experts designated and called by other parties to the suit. Defendant expresses its intention to possibly call, as witnesses associated with adverse parties, any of the individuals identified by the adverse parties as experts.

Defendant reserves the right to call un-designated rebuttal expert witnesses, whose testimony cannot reasonably be foreseen until the presentation of the evidence against the Plaintiff.

Defendant reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, to re-designate same as a consulting expert, who cannot be called by opposing counsel

Defendant reserves the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

By: //s// Branch M. Sheppard

BRANCH M. SHEPPARD

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**ATTORNEYS FOR SPECIALIZED LOAN SERVICING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all parties of record on March 13, 2023 as follows:

**VIA CM/ECF**

WILLIAM M. CLANTON  
LAW OFFICE OF BILL CLANTON, P.C.  
926 CHULIE DR.  
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**COUNSEL FOR PLAINTIFFS**

//s// Branch M. Sheppard  
Branch M. Sheppard